

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., et al.,  
  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)  
  
(Jointly Administered)**

**AFFIDAVIT AND DISCLOSURE STATEMENT OF JOHN T. COX III,  
ON BEHALF OF LYNN PINKER COX & HURST, LLP**

STATE OF TEXAS            )  
                                      )  
COUNTY OF DALLAS        )

John T. Cox III, being duly sworn, upon his oath, deposes and says as follows:

1. I am a Partner of Lynn Pinker Cox & Hurst, LLP, located at 2100 Ross Avenue, Suite 2700, Dallas, Texas 75201 (the “**Firm**”).
2. Purdue Pharma L.P. and its affiliates that are debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), have requested that the Firm provide services to the Debtors, and the Firm has consented to provide such services (the “**Services**”).
3. The Services include, but are not limited to, the following: legal advice and representation.

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<sup>1</sup> The Debtors in these cases , along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield Bio Ventures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

4. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. The Firm does not perform any services for any such person in connection with these chapter 11 cases. In addition, the Firm does not have any relationship with any such person, such person's attorneys, or such person's accountants that would be adverse to the Debtors or their estates with respect to the matters on which the Firm is to be retained.

5. Neither I, not any principal of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and regular employees of the Firm.

6. Neither I nor any principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest materially adverse to the Debtors or their estates with respect to the matters on which the firm is to be retained.

7. As of the commencement of this chapter 11 case, the Debtors owed the Firm zero dollars in respect of prepetition services rendered to the Debtors.

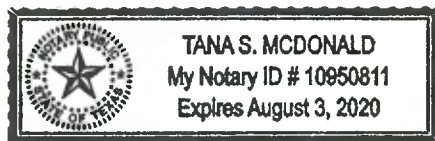
8. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of this inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Affidavit.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Affidavit and Disclosure Statement was executed on December 17, 2019, at Dallas, Texas.

  
\_\_\_\_\_  
John T. Cox III

SWORN TO AND SUBSCRIBED before me this 17<sup>th</sup> day of December 2019.

  
\_\_\_\_\_  
Notary Public



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**RETENTION QUESTIONNAIRE**

TO BE COMPLETED BY PROFESSIONALS EMPLOYED by Purdue Pharma L.P. and its affiliates that are debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”).

All questions **must** be answered. Please use “none,” “not applicable,” or “N/A,” as appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of professional:

Lynn Pinker Cox & Hurst, LLP, 2100 Ross Avenue, Suite 2700, Dallas, Texas 75201.

Individual working professionals at Lynn Pinker Cox & Hurst, LLP include: John T. Cox III, Eric W. Pinker, John D. Volney, Elizabeth Y. Ryan, Jared Eisenberg, Cory Johnson, Natalie Soas, Wendy Cassidy, and Michael Carrigan.

2. Date of retention:

September 25, 2018

3. Type of services to be provided:

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Legal representation and advice regarding opioid litigation, including the multi-district litigation pending in the United States District Court for the Northern District of Ohio, and lawsuits filed by various state attorneys general.

4. Brief description of services to be provided:

Lynn Pinker Cox & Hurst, LLP will provide legal advice and representation in the opioid litigation as necessary, including legal services for the completion of discovery, motion practice, oral arguments, trial preparation, and trial.

5. Arrangements for compensation (hourly, contingent, etc.):

(a) Average hourly rate (if applicable): John T. Cox III – \$760.50; Eric W. Pinker - \$760.50; John D. Volney - \$577.50; Elizabeth Y. Ryan - \$577.50; Jared Eisenberg - \$445.00; Cory Johnson - \$365.00; Natalie Soas - \$365.00; Wendy Cassidy - \$235.00; and Michael Carrigan - \$105.00.

(b) Estimated average monthly compensation based on prepetition retention (if company was employed prepetition):

As long as litigation is stayed, less than \$15,000.00 per month. However, if the opioid litigation resumes, then between \$200,000.00 and \$800,000.00 per month.

6. Prepetition claims against the Debtors held by the company:

Amount of claim: None

Date claim arose: Not applicable

Nature of claim: Not applicable

7. Prepetition claims against the Debtors held individually by any member, associate, or employee of the company:

Name: None

Status: Not applicable

Amount of claim: Not applicable

Date claim arose: Not applicable

Nature of claim: Not applicable

8. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates for the matters on which the professional is to be employed:

None.

9. Disclose whether the professional currently represents any of the Debtors' existing shareholders, including trusts, beneficiaries, companies, affiliates, family members and any similar related parties (together, the "**Shareholder Parties**"), and/or any entity owned or controlled by any Shareholder Party (in each case other than any Debtor), and whether any Shareholder Party or any entity owned or controlled by any Shareholder Party (other than any Debtor) accounted for more than 1% of the professionals' annual revenue for any of the last five years. If so, describe what ethical walls or other protections are in place with regard to the current representations.

Lynn Pinker Cox & Hurst, LLP does not represent any of the Shareholder Parties or any other entity owned or controlled by any Shareholder Party.

10. Name and title of individual completing this form:

John T. Cox III

Dated: December 17, 2019